



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

June 6, 2016

Ms. Arianne Logwood
Regulatory Division, CESWG-RD-E
U.S. Army Corps of Engineers
P.O. Box 1229
Galveston, Texas 77553-1229

Dear Ms. Logwood:

The Environmental Protection Agency (EPA) Region 6 has reviewed Public Notice (PN) SWG-2004-02523, dated May 5, 2016. The applicant, Sabine Pass LNG, Inc., proposes to discharge fill material into waters of the United States for the construction of a secure site entrance for the Sabine Pass Liquefied Natural Gas (LNG) Terminal that consists of a new access driveway, a new deceleration lane associated with the driveway, a visitor parking lot, sidewalks, and widening of existing Lighthouse Road. The proposed project will impact two palustrine emergent wetlands totaling 1.25 acres.

The project site is located in wetlands adjacent to Sabine Pass, at 9243 Gulf Beach Highway, in Cameron, Cameron Parish, Louisiana. The project can be located on the U.S.G.S. quadrangle map titled: Sabine Pass, Texas.

Latitude: 29.763205 North; Longitude: -93.867168 West

The project is located in a wetland area along Highway 82 adjacent to the Sabine Pass LNG Terminal to the west and south. To the north and east are undeveloped tracts of land dominated by wetlands according to the National Wetland Inventory. The subject wetlands are comprised of Jesuit's bark (*Iva frutescens*), torpedo grass (*Panicum repens*), dwarf saltwort (*Salicornia bigelovii*), and saltmeadow cordgrass (*Spartina patens*).

The applicant has stated that they have avoided and minimized the environmental impacts by designing the roadway deceleration lane and driveway improvements to meet the Louisiana Department of Transportation minimum standards. The proposed driveway and parking lot area were routed and located to avoid impacts to the adjacent wetlands to the extent practicable, and sized to meet the minimum requirements for necessary parking outside the facility security screening entrance. The applicant proposed to mitigate for the proposed impacts by making a contribution to the Louisiana Department of Natural Resources In-Lieu Fee Program. All wetlands impacted in Louisiana must be mitigated within the state but there are no compensatory mitigation banks or in-lieu fee programs located within the Galveston District.


The Corps is reviewing this application pursuant to Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act (CWA).

The following comments are being provided for use in reaching a decision relative to compliance with the EPA's *404(b)(1) Guidelines for the Specification of Disposal Sites for Dredged or Fill Material* (40 CFR Part 230):

- We recommend the applicant provide an alternatives analysis.
- We recommend the applicant demonstrate that significant efforts were undertaken to avoid and minimize impacts to aquatic habitats, including wetlands. In our opinion, the brief general statement contained in the PN is not adequate to demonstrate that efforts were made to avoid and minimize impacts to aquatic resources.
- We recommend the applicant assess the wetland functional losses, and provide this for review and comment. This should be the basis for required mitigation. Whatever assessment technique is used should be compatible with the in lieu fee program proposed to be used for the required mitigation.

If you have any questions on these comments, please contact Ken Teague of my staff at 214-665-6687.

Sincerely yours,



Maria L. Martinez
Chief
Wetlands Section

cc: NOAA Fisheries, Baton Rouge
USFWS, Lafayette
LDEQ
LDNR
LDWF